

UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20530

SUPPLEMENTAL STATEMENT

Pursuant to Section 2 of the Foreign Agents
Registration Act of 1938, as Amended

For Six Month Period Ending MAY 13 1978
(Insert date)

Name of Registrant **Prather Seeger Doolittle** Registration No. **1815**
& Farmer

Business Address of Registrant **1101 Sixteenth Street, N.W.**
Washington, D. C. 20036

I - REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in Item 1.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position	Date Connection Ended
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4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? ☐ Yes ☒ No

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal? Yes ☐ No ☒

If yes, identify each such person and describe his services.

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6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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II - FOREIGN PRINCIPAL

8. Has your connection with any foreign principal ended during this 6 month reporting period?
Yes ☐ No ☒

If yes, furnish the following information:

Name of foreign principal

Date of Termination

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9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish following information:

Name and address of foreign principal

Date acquired

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10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

Central de Cooperativas Agrarias de Produccion Azucarera del Peru
(CECOAAP)
Empresa de Transporte Aereo del Peru (AeroPeru)
Minero Peru

III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

We performed no services subject to the Act for AeroPeru or Minero Peru during the period. Services performed for CECO AAP consisted of advising the client on U.S. actions with respect to sugar legislation and presenting a statement to the U.S.I.T.C. in connection with its sugar hearings (see Attachment).

¹ The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?

Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

See item 11

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals?

Yes ☐ No ☒

If yes, describe fully.

² The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
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In the case of AeroPeru and Minero Peru no income was received during the period for services subject to the Foreign Agents Registration Act. Total income from CECOAAP was \$4,694.99.

Total

14. (b) RECEIPTS - THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☐ No ☒

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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Total

15. (b) DISBURSEMENTS - THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes ☒ No ☐

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
1/78	\$100.00		Robert Casey
11/77	10.00	Dollars for Democrats	
11/77	50.00	Committee for Tim Wirth	
1/78	100.00	Committee for Tim Wirth '78	
3/78	100.00	Congressman St. Germain	

V - POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

Central de Cooperativas Agrarias de Produccion Azucarera del Peru
(CECOAAP)

⁵ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda?
Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts ☐ Magazine or newspaper articles ☐ Motion picture films ☐ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches

☒ Other (specify) Statement before U.S. International Trade Commission

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☐ Public Officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (Specify) _____

21. What language was used in this political propaganda:

☒ English ☐ Other (specify) _____

22. Did you file with the Registration Section, Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period?

Yes ☒ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☒ No ☐

24. Did you file with the Registration Section, Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act?

Yes ☒ No ☐

VI - EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes ☐ No ☐

Exhibit B⁷ Yes ☐ No ☐

If no, please attach the required exhibit.

- (a) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period?

Yes ☐ No ☐

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

⁶ The Exhibit A, which is filed on Form OBD-67 (Formerly DJ-306) sets forth the information required to be disclosed concerning each foreign principal.

⁷ The Exhibit B, which is filed on Form OBD-65 (Formerly DJ-304) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6 month reporting period.

Yes ☐ No ☐

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements, been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☐ No ☐

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) his (their) personal knowledge.

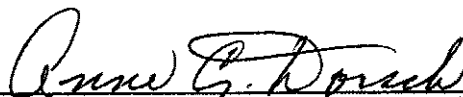
(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)


Edwin H. Seeger

Subscribed and sworn to before me at Wash, D.C.

this 25th day of October, 19 78



(Signature of notary or other officer)

My Commission Expires May 31, 1981

⁸ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, Department of Justice, Washington, D.C. 20530.

This statement is made by Prather Seeger Doolittle & Farmer, which has registered with the U. S. Department of Justice as an agent of the Sugar Industry of Peru through its central organization, Central de Cooperativas Agrarias de Produccion Azucarera del Peru (CECOAAP). Pursuant to the Foreign Agents Registration Act of 1938, as amended, a copy of such registration is available for inspection at the U. S. Department of Justice. Three copies of the accompanying statement have been filed with the U. S. Department of Justice as required by the Foreign Agents Registration Act of 1938, as amended. The registration of Prather Seeger Doolittle & Farmer does not indicate approval by the United States Government of the contents of this material.

BEFORE THE
UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D. C.

In the matter of

INVESTIGATION OF SUGAR IMPORTS

:
:
:
: No. 22-41
:

STATEMENT OF
THE SUGAR INDUSTRY OF PERU,
CENTRAL DE COOPERATIVAS AGRARIAS DE
PRODUCCION AZUCARERA DEL PERU (CECOAAP)

This statement, in lieu of oral testimony, is submitted in the above matter on behalf of the Peruvian sugar industry.

At the request of the President, the United States International Trade Commission, on November 23, 1977, instituted an investigation under Subsection (a) of Section 22 of the Agricultural Adjustment Act, as amended (7 U.S.C. 624), to determine whether --

sugar, sirups, and molasses, provided for in items 155.20 and 155.30 of Part 10-A, Schedule 1 of the Tariff Schedules of the United States (TSUS),

are being or are practically certain to be imported into the United States under such conditions and in such quantities as to render or tend to render ineffective, or materially interfere with, the price support operations now being conducted by the U.S. Department of Agriculture for sugar cane or beets, or to reduce substantially the amount of any product being processed in the United States from such domestic sugar cane or sugar beets.

With respect to the issues rendered by the President's request to the Commissioner, the position of the Peruvian sugar industry in brief is that:

1. If the Commissioner finds that entry of sugar into the U.S. market at current world prices threatens to interfere with the U.S. government price support program, Peru urges that further import duty increases should not be the recommended remedy. A principal reason why this remedy should be rejected is that it would not be effective in curtailing imports. This is so because many of the producing countries are under such balance of payments pressure to earn dollars that they will sell raw sugar in the U.S. even if their dollar earnings are drastically reduced by higher import duties.

2. Furthermore, by reducing the dollar income for the exporting country for each pound of sugar sold in the U.S., a program of higher import duties on raw sugar would run counter to basic U.S. government policy of assisting developing countries in balance of payments difficulties by support to their export sales of basic raw materials. This policy is evidenced by increased U.S. financial support for the Compensatory Financing Facility of the IMF.

3. On the other hand, the traditional U.S. policy of country-by-country quotas has the threefold benefit of ensuring that

a) In time of world wide surplus, sugar imports can be effectively limited to a specific share of total U.S. consumption.

b) In time of world wide shortage, a specified level of imports will be available for the U.S. consumer.

c) A large share of the dollar earnings resulting from the sale of sugar imports at the specified tonnage level will accrue to the exporting countries whose balance of payments needs are a concern of U.S. government policy.

BACKGROUND

The Peruvian sugar industry is organized as a system of worker-owned cooperativas incorporated within a central body, Central de Cooperativas Agrarias de Produccion Azucarera del Peru (CECOAAP). The Peruvian sugar industry has traditionally been one of the largest suppliers of sugar to the United States. For example, in 1974, the last year of the Sugar Act, Peru was the fifth largest supplier of sugar to the U.S. market and the fourth largest among Western Hemisphere suppliers.

In all, some 240,000 Peruvians rely directly on the industry for their subsistence. In addition, sugar represents an important element of Peru's gross national product and a major source of foreign exchange. Indeed, in 1975, sugar was Peru's main export commodity; sales to the U.S. market amounted to \$270 million that year. The Peruvian sugar industry is also a major importer of products and capital goods from the United States. During 1976 and 1977 sugar continued to be a major export commodity for Peru, although due to lower prices sugar accounted for a smaller share of Peru's export income. On a tonnage basis, however, Peru, during 1977, maintained its normal level of sugar sales to the United States at roughly 312,000 tons.

FAILURE OF DUTIES TO PROVIDE EFFECTIVE RELIEF TO DOMESTIC INDUSTRY.

Subsequent to the termination of the Sugar Act on January 1, 1975, sugar prices in the U.S. and on the world market declined sharply and, as a result, U.S. producers called for and obtained U.S. government intervention in the form of increased import duties. Responding to the demands of domestic producers, the President decreed three separate duty increases in the period between September 1976 and January 1978. The result of these Presidential initiatives was to increase import duties more than 800% during that period, causing the effective rate of these duties to rise from .625 cents per pound to 5.5125 at present. Nevertheless, imports of raw sugar into the U.S. did not decline during that period but, in fact, increased. Total imports of raw sugar during 1977 were roughly 30% greater in 1977 than during 1976. Not surprisingly, therefore, domestic producers are again requesting relief, and the President in his letter to the Commissioner, requesting the current investigation, indicates his sympathy for the pleas of the domestic producers.

TARIFFS ALSO DAMAGE THE FOREIGN PRODUCER.

Since the U.S. market for sugar represents roughly 20% of world market, the effect of an increase of U.S. duty during period of world wide surplus, as at present, is simply to force the world market price down to whatever level is required to ensure that the landed price in the U.S. (i.e., world price plus U.S. duty) is equal to or slightly under the U.S. government price support program. The inevitability of this process was demonstrated during the early part of the year when the U.S., on January 20, increased the import duty and the world price of sugar declined about 1 cent per pound, thus keeping the landed price at roughly the level of the U.S. support price.

The net result is to leave import tonnage levels largely unaffected while shifting some of the income from sugar imports from the developing country producers to the U.S. Treasury.

As is true of the sugar producers of the United States, and we are sure, those of all other countries, the Peruvian sugar industry is experiencing serious losses that prevent a threat to its economic and financial stability. The experienced cost levels of the various growing units within the Peruvian sugar industry have been higher, for

the past several months, than the selling price in the world market which, of course, now includes the U.S. market. There is no sign that prices will rise to a level equivalent to costs in the near future, and the prospect of profitable operations is even more remote. To the contrary, the prevalent opinion is that prices will remain uneconomically low.

The impact of increased tariffs, therefore, is directly contrary to the clearly expressed policy of the U.S. government during recent years with respect to commodity exports from the developing countries. The U.S. has been a leader in a variety of international meetings designed to develop international mechanisms which would stabilize commodity prices for raw materials produced by developing countries, such as Peru, at price levels adequate to ensure reasonable profitability. In the case of such special financing mechanisms as the Compensatory Financing Facility at the IMF, the U.S. has pledged substantial financial contributions to assist the maintenance of raw material prices for the developing countries. It is, therefore, self-defeating for the U.S. to divert to the U.S. Treasury income from sugar imports that should go to the producing countries.

IMPORT QUOTAS ARE BETTER DESIGNED TO ASSIST THE FOREIGN
AND DOMESTIC PRODUCERS AND ENSURE ADEQUATE SUPPLIES FOR
THE CONSUMER.

At the same time that successive Presidents endorsed vast increases in import duties on sugar, the Commission conducted its investigation of sugar imports and their effect on the U.S. market (TA-201-16) and, in March 1977, recommended the reimposition of a quota system for sugar imports totalling 4,275,000 short tons, which is an amount slightly below total 1976 imports but substantially below the 1977 import total. In making its recommendation the Commission noted that market conditions in 1977 were similar to those prior to 1934, which led to the adoption of the sugar legislation which operated successfully from 1934-1974 on the basis of country by country quotas after a long period when very high import duties had failed to preserve the viability of the domestic market. Nevertheless, the President rejected the Commission's recommendation and doubled import duties instead. Less than a year later, however, the President has found it necessary to again ask the Commission to consider new

means of relief for the domestic producer since the President's tariff plus domestic support price program has already shown itself to be ineffective.

The available experience with both tariffs and quotas provides ample evidence of the impact of each of these devices and sharply supports the wisdom of the Commission's March 1977 decision. We believe, therefore, that if the Commission decides on the basis of the current investigation to recommend some form of protection for domestic producers a country-by-country quota system, based on recent import levels to reflect the reality of current production and export capabilities, would be most likely to benefit foreign and domestic producers and the U.S. consumer. The essential element of any remedy proposed should be the inclusion of incentives to supplying countries to export to the U.S. at times when world prices exceed U.S. prices. Therefore, we urge the Commission to include as part of a recommended quota system a provision, similar to that included in the Sugar Act, for the reduction of a country quota to the extent that any supplying country fails to fulfill its quota.

In short, a return to the proven system in effect during 1934-1974 and supported by the Congress during this lengthy period would clearly best serve all the interests concerned.

Respectfully submitted,

/s/ Edwin H. Seeger

EDWIN H. SEEGER

/s/ Thomas L. Farmer

THOMAS L. FARMER

Attorneys for CECO AAP

March 17, 1978

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D. C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes X or No

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes X or No

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

Edwin H. Seeger
Signature

10/25/78
Date

Edwin H. Seeger

EDWIN H. SEEGER
Please type or print name of
signatory on the line above

PARTNER
Title